

SCOTT P. JANG (State Bar No. 260191)
RALPH J. DIMARUCUT (State Bar No. 356733)
JACKSON LEWIS P.C.
50 California Street, 9th Floor
San Francisco, California 94111
Telephone: 415.394.9400
Facsimile: 415.394.9401
E-mail: scott.jang@jacksonlewis.com
E-mail: ralph.dimarucut@jacksonlewis.com

Attorneys for Defendants:
LUCIDWORKS, INC., KYLE HAMMETT,
NATALIA PASCUZZI, JULIANNE KIRBY, AND
MIKE SINOWAY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

TAHTIANA JADE BROWN,

Plaintiff,

v.

LUCIDWORKS, INC., PREFERRED
EMPLOYERS' INSURANCE, BERKELEY
TECHNOLOGY, CALIFORNIA WORKERS'
COMPENSATION APPEALS BOARD
(WCAB), MICHAEL SULLIVAN &
ASSOCIATES, LAURA MARCHAN,
MUTUAL OF OMAHA, APPLEBY & CO.,
DAN MOON, TILT, KYLE HAMMETT,
NATALIA PASCUZZI, JULIANNE KIRBY,
MIKE SINOWAY, GRANT INGERSOLL,
ERIK HATCHER, YONIK SEELEY

Defendants.

Case No. 2:25-cv-00607-DC-CKD

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE HEARING
DATE RE: MOTION TO DISMISS
(ECF No. 19)**

Date: May 21, 2025
Time: 10:00 a.m.
Court: Courtroom 24

Currently pending before the Court are (1) Defendants Lucidworks, Inc., Kyle Hammett, Natalia Pascuzzi, Julianne Kirby, and Mike Sinoway's Motion to Dismiss (ECF No. 19), which is currently set for hearing at 10:00 a.m. on May 21, 2025; and (2) Defendant California Workers Compensation Appeals Board's Motion to Dismiss (ECF No. 28), which is currently set for hearing at 10:00 a.m. on June 11, 2025. Plaintiff Tahtiana Jade Brown and the above-mentioned defendants have met and conferred and, due to schedule conflicts and in the interest of judicial and party economy, have agreed to consolidate the hearing dates for the two motions to dismiss. Specifically, the parties stipulate to continue the hearing date for Defendants Lucidworks, Inc., Kyle Hammett, Natalia Pascuzzi, Julianne Kirby, and Mike Sinoway's Motion to Dismiss (ECF No. 19) from May 21, 2025 at 10:00 a.m. to June 11, 2025 at 10:00 a.m.

IT IS SO STIPULATED.

Dated: April 30, 2025

TAHTIANA JADE BROWN.

By: /s/ Tahtiana Brown
APPEARING PRO SE

Dated: April 30, 2025

JACKSON LEWIS P.C.

By: /s/ Scott Jang
Scott P. Jang
Ralph J. Dimarucut
Attorneys for Defendants
LUCIDWORKS, INC., KYLE HAMMETT,
NATALIA PASCUZZI, JULIANNE
KIRBY, AND MIKE SINOWAY

[additional signatures and proposed order on next page]

1 Dated: April 30, 2025

CALIFORNIA WORKERS'
COMPENSATION BOARD

2
3
4
5 By: /s/ Allison Fairchild
Allison J. Fairchild
Attorneys for Defendant
6 CALIFORNIA WORKERS'
7 COMPENSATION APPEALS BOARD
8
9
10

11 **~~PROPOSED~~ ORDER**

12 Pursuant to the Parties' stipulation, and good cause appearing, it is hereby ORDERED that
13 the hearing on Defendants Lucidworks, Inc., Kyle Hammett, Natalia Pascuzzi, Julianne Kirby,
14 and Mike Sinoway's Motion to Dismiss (ECF No. 19) is RESET to June 11, 2025 at 10:00 a.m.

15 **IT IS SO ORDERED.**

16 Dated: April 30, 2025

17 
18 CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE
19

20 8, brow25cv0607.stip.611
21
22
23
24
25
26
27
28